UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

CHARLES C. FREENY III, BRYAN E. FREENY, AND JAMES P. FREENY,

Case No. 2:17-cv-0155-RWS-RSP

PLAINTIFFS,

JURY TRIAL DEMANDED

V.

WALT DISNEY PARKS AND RESORTS WORLDWIDE, INC. AND DISNEY ONLINE,

DEFENDANTS.

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiffs Charles C. Freeny III, Bryan E. Freeny, and James P. Freeny (collectively "the Freenys") and Defendants Walt Disney Parks and Resorts Worldwide, Inc. and Disney Online (collectively, "Disney") respectfully move the Court to stay all pending deadlines in the case for 30 days until July 14, 2017.

The Freenys and Disney have settled, in principle, all matters in controversy between the parties and are in the process of finalizing settlement and dismissal papers for this action, and therefore respectfully request that the Court enter an Order staying all deadlines in this case until July 14, 2017. A Proposed Order reflecting the parties' request for a stay is filed herewith.

Dated: June 13, 2017 Respectfully submitted,

/s/ Jennifer L. Gilbert

Jennifer L. Gilbert

BANYS, P.C.

Christopher D. Banys Richard C. Lin

SBN: 230038 (California) SBN: 209233 (California)

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Jennifer L. Gilbert SBN: 255820 (California)

1032 Elwell Court, Suite 100

Palo Alto, CA 94303 Tel: (650) 308-8505 Fax: (650) 353-2202 cdb@banyspc.com rcl@banyspc.com jlg@banyspc.com

LOCAL COUNSEL:

TRUELOVE LAW FIRM, PLLC Kurt Truelove Texas Bar No. 24013653 100 West Houston P.O. Box 1409 Marshall, Texas 75671 Telephone: (903) 938-8321

Facsimile: (903) 215-8510

Email: kurt@truelovelawfirm.com

ATTORNEYS FOR PLAINTIFFS CHARLES C. FREENY III, BRYAN E. FREENY, AND JAMES P. FREENY

/s/ Jon Y. Chow

Jon Y. Chow

ATTORNEY FOR DEFENDANTS WALT DISNEY PARKS AND RESORTS WORLDWIDE, INC. AND DISNEY ONLINE

CERTIFICATE OF SERVICE

I hereby certify that on June 13, 2017, a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Pursuant to Local Rule CV-5(a)(3)(A) this document was served on all counsel who are deemed to have consented to electronic service.

/s/ Tiffany Dang
Tiffany Dang